

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

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|----------------------------|---|---------------------------------|
| |) | MDL Docket No. 1:10-md-2197-DAK |
| IN RE: DEPUY ORTHOPAEDICS, |) | |
| INC. ASR HIP IMPLANT |) | HONORABLE DAVID A. KATZ |
| PRODUCTS LIABILITY |) | |
| LITIGATION |) | |
| |) | |
| ----- |) | |
| THIS DOCUMENT APPLIES TO: |) | |
| ALL CASES |) | |

NOTICE OF ORAL AND VIDEO DEPOSITION OF
DEPUY ORTHOPAEDICS, INC., PURSUANT TO FED. R. CIV. P. 30(B)(6)
(Marketing and Third Party Vendors)

TO: Robert C. Tucker, Esq.
TUCKER ELLIS & WEST LLP
1150 Huntington Building
925 Euclid Avenue
Cleveland, OH 44115

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Attorneys for Defendant DePuy Orthopaedics, Inc.

PLEASE TAKE NOTICE that pursuant to Rule 26 and Rule 30(b)(6) of the Federal Rules of Civil Procedure, plaintiffs, by and through their undersigned attorneys, the Plaintiffs Steering Committee in the above-captioned Multidistrict Litigation, will take the deposition of DePuy Orthopaedics, Inc. on September 9, 2011, at 9:00 a.m., or such other time as is agreed upon by the parties, at the offices of the Hyatt Place Indianapolis Airport, 5500 W. Bradbury Avenue, Indianapolis, Indiana 46241, or at another location mutually agreed upon by the parties. Pursuant to Fed. R. Civ. P. 30(b)(6), DePuy Orthopaedics, Inc. shall designate and produce a

representative or representatives, as may be required, to testify on behalf of DePuy Orthopaedics, Inc. concerning the topics identified in Exhibit A attached hereto.

The deposition shall be recorded by stenographic and audiovisual means and taken before a person authorized by law to administer oaths, pursuant to Fed. R. Civ. P. 28, and will continue from day-to-day, excluding Sundays and court-recognized holidays, until the examination is completed.

Dated: August 8, 2011

Respectfully submitted,

ZOLL, KRANZ & BORGESS, LLC,

By: /s/ Michelle L. Kranz
Michelle L. Kranz (0062479)
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Plaintiffs' Liaison Counsel

CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2011, a copy of the above and foregoing NOTICE OF ORAL AND VIDEO DEPOSITION OF DEPUY ORTHOPAEDICS, INC., PURSUANT TO FED. R. CIV. P. 30(b)(6), and the Exhibit hereto, was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system

Dated: August 8, 2011

/s/Michelle L. Kranz

Plaintiffs' Liaison Counsel